

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

All actions

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**MOTION FOR LEAVE TO FILE MOTION TO ESTABLISH QUALIFIED
SETTLEMENT FUND, APPOINT TRUST ADMINISTRATOR, AND APPROVE
PAYMENT UNDER SEAL**

Pursuant to Local Rule 5.2, Defendants Johnson & Johnson, Janssen Pharmaceuticals, Inc., Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc., and Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc. (collectively “Janssen”) respectfully move this Court for leave to file their Motion to Establish Qualified Settlement Fund, Appoint Trust Administrator, and Approve Payment (“Motion”), along with the attached Exhibit and Proposed Order, under seal.

Local Rule 5.2 states: “No document will be accepted for filing under seal unless a statute, court rule, or prior court order authorizes the filing of sealed documents.” Because the settlement Janssen referenced in the Motion has not been made public, the fact of the agreement is confidential under this Court’s February 6, 2018 Order regarding the confidentiality of settlement discussions (ECF No. 116).

WHEREFORE, Janssen respectfully requests that the Court grant Janssen’s motion for leave to file the Motion and related papers under seal.

Dated: December 23, 2021

Respectfully submitted,

/s/ Charles C. Lifland

Charles C. Lifland

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Johnson, Janssen Pharmaceutica, Inc.

n/k/a Janssen Pharmaceuticals, Inc., and

Ortho-McNeil-Janssen Pharmaceuticals,

Inc. n/k/a Janssen Pharmaceuticals, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of December 2021, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF system.

By: /s/ Charles C. Lifland